

**Gabroy | Messer**  
 170 S. Green Valley Pkwy., Suite 280  
 Henderson, Nevada 89012  
 (702) 259-7777 FAX: (702) 259-7704

GABROY | MESSER  
 Christian Gabroy (#8805)  
 Kaine Messer (#14240)  
 The District at Green Valley Ranch  
 170 South Green Valley Parkway, Suite 280  
 Henderson, Nevada 89012  
 Tel (702) 259-7777  
 Fax (702) 259-7704  
 christian@gabroy.com  
 kmesser@gabroy.com  
*Attorneys for Plaintiff Tiare Ramirez*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TIARE RAMIREZ, an individual;

Plaintiff,

vs.

WYNN LAS VEGAS, LLC; DOES I  
 through X; and ROE Corporations XI  
 through XX, inclusive;

Defendant.

Case No: 2:19-cv-01174-APG-DJA

**STIPULATION AND ORDER TO EXTEND  
 DEADLINE FOR PLAINTIFF TO  
 RESPOND TO DEFENDANT'S MOTION  
 FOR SUMMARY JUDGMENT (ECF No.  
 57)**

(2nd Request)

**STIPULATION AND ORDER TO EXTEND DEADLINE FOR PLAINTIFF TO  
 RESPOND TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT (ECF No. 57)**

The parties by and through their respective attorneys of record, hereby stipulate to a fourteen (14) day extension through February 17, 2022 for Plaintiff Tiare Ramirez ("Plaintiff") to respond to Defendant Wynn Las Vegas, LLC's ("Defendant") Motion for Summary Judgment (ECF No. 57) filed on November 29, 2021. The parties further stipulate that Defendant shall have an additional seven (7) days to respond to Plaintiff's response up to and including March 10, 2022.

Defendant filed its Motion for Summary Judgment (ECF No. 57) on November 29, 2021. Plaintiff's response is currently due on February 3, 2022. Defendant's reply brief is therefore currently due on February 17, 2022 per LR 7-2(b). Plaintiff has requested the extension and Defendant has agreed to the request in exchange for an additional week for the reply briefing, to which Plaintiff has agreed.

Good cause exceedingly exists for such extension. As previously indicated, Plaintiff's trial counsel's immediate family member suffered a medical emergency, requiring intubation. Such individual remains under supervised care, and unfortunately has very recently received an unfavorable diagnosis. This family emergency has necessarily required a great deal of Plaintiff's trial counsel's time and attention.

Accordingly, the parties agree that Plaintiff's response to Defendant's Motion for Summary Judgment (ECF No. 57) shall be due on February 17, 2022 and Defendant's reply shall be due on March 10, 2022.

This request is not sought for any improper purpose or other reason of delay. No party is prejudiced by the requested extension.

**IT IS SO STIPULATED.**

Dated: February 3, 2022

Dated: February 3, 2022

Respectfully submitted,

Respectfully submitted,

/s/ Christian Gabroy

/s/ Kelsey Stegall

Christian Gabroy, Esq. (#8805)  
Kaine Messer, Esq. (#14240)  
GABROY | MESSER

Wendy Medura Krincek, Esq. (#6417)  
Kelsey E. Stegall, Esq. (#14279)  
LITTLER MENDELSON P.C.

*Attorneys for Plaintiff*

*Attorneys for Defendant*

**IT IS SO ORDERED.**

  
\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE      February 4, 2022  
DATE